

19 Mag. 3608

JOHN LAMBERT,
a/k/a "Eric Pope,"

Benjamin Woodside Schrier, pursuant to Title 28, United States Code, Section 1746,
hereby declares under penalty of perjury:

2. The defendant was charged in a complaint dated April 11, 2019, with violations of 18 U.S.C. §§ 1349, 1343, and 2. The defendant was arrested on April 16, 2019, presented before Magistrate Judge Clifton Corker of the Eastern District of Tennessee on April 16, 2019, and presented before Magistrate Judge Kevin N. Fox of the Southern District of New York on April 29, 2019. At his presentment before Judge Fox, the defendant was represented by Julia Gatto, Esq., of the Federal Defenders of New York, and ordered bailed. The defendant is currently represented by Gary A. Peters, Esq.

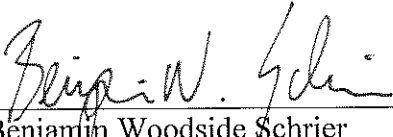
3. At the initial presentment, Ms. Gatto consented to a waiver of her client's right pursuant to Rule 5.1 of the Federal Rules of Criminal Procedure to a preliminary hearing within 14 days of the initial appearance. Accordingly, under the Speedy Trial Act, the Government initially had until May 16, 2019 within which to file an indictment or information.

4. Defense counsel and I have had discussions regarding a possible disposition of this case beginning on April 29, 2019 and continuing to as recently as May 13, 2019. The negotiations have not been completed and we plan to continue our discussions, but do not anticipate a resolution before the deadline under the Speedy Trial Act expires on May 16, 2019.

5. Therefore, the Government is requesting a 30-day continuance until June 15, 2019, to continue the foregoing discussions and reach a disposition of this matter. On May 13, 2019, I personally communicated with Mr. Peters, who specifically consented to this request on behalf of his client.

6. For the reasons stated above, the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, NY
May 13, 2019


Benjamin Woodside Schrier
Assistant United States Attorney
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